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10 *Attorney for Plaintiff*

11
12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 CHAMPERY RENTAL REO, LLC, a
15 California Limited Liability Company

16 Plaintiff(s),

17 v.

18 ADAM W. POLSON, an individual;
19 INTERNAL REVENUE SERVICE; WELLS
20 FARGO BANK, N.A.; All other persons
21 unknown claiming any right, title, estate, lien
22 or interest in the real property described in the
23 complaint adverse to Plaintiff's ownership, or
24 any cloud upon Plaintiff's title thereto; DOES
25 and ROES I through X, inclusive;

26 Defendant(s).

27 AND RELATED ACTIONS.

28 Plaintiff/Counter-Defendant Champery Rental REO, LLC ("Champery"),
Defendant/Counter-Plaintiff/Third-Party Plaintiff Adam W. Polson ("Polson"), Defendant
Internal Revenue Service ("United States"), Defendant Wells Fargo Bank, N.A. ("Wells Fargo"),

FILED
ENTERED
RECEIVED
SERVED ON
COUNSEL/PARTIES OF RECORD

JAN - 7 2020

CLERK US DISTRICT COURT
DISTRICT OF NEVADA

BY: _____ DEPUTY

Civil No. 3:19-CV-00529-MMD-CBC

**STIPULATION AND ORDER TO
CONTINUE JANUARY 13, 2020 CASE
MANAGEMENT CONFERENCE**

1 and Third-Party Defendant Renovista Ridge Master Property Owners Association (“Renovista”),
2 by and through their respective attorneys of record, stipulate to continue the Case Management
3 Conference currently scheduled for January 13, 2020 at 10:00 a.m. to the mutually convenient
4 time of January 17, 2020 at 11:00 a.m.
5

6 Counsel for all parties has been notified by Matthew K. Schriever, counsel for Champery,
7 that he has a personal scheduling conflict and is unable to attend the January 13, 2020 hearing in
8 person, as ordered by the Court. Specifically, Mr. Schriever’s wife has a previously planned trip
9 out of town and does not return home until the evening of January 13, 2020. Her flights were
10 booked on October 20, 2019. Mr. Schriever’s wife typically takes on the responsibility of getting
11 their three kids ready for school, dropping them off at three different schools, and picking them
12 up from those schools. Because she will be out of town on Monday, January 13, 2020, Mr.
13 Schriever is taking on those family responsibilities that day and there is not adequate time for
14 him to get his children to school in Las Vegas, NV in the morning, fly to Reno, NV to attend the
15 hearing in person at 10:00 a.m., and fly back to Las Vegas, NV to pick his children up from
16 school in the afternoon.¹
17

18
19 Upon learning of the continued hearing and in person attendance requirement, Mr.
20 Schriever contacted the Courtroom Administrator on January 6, 2020 to advise her of the
21 scheduling conflict. The Courtroom Administrator indicated Friday, January 17, 2020 at 11:00
22 a.m. as a possible alternative date for the hearing if all parties stipulated and if the Court granted
23 the stipulation. Accordingly, Mr. Schriever contacted all counsel of record and the parties hereby
24
25
26
27

28 ¹ Mr. Schriever would be available to attend the hearing on Monday, January 13, 2020 *telephonically*, but for the reasons state above is not available to personally attend a hearing in Reno, NV on that date.

1 stipulate that the January 13, 2020 hearing be continued to **January 17, 2020 at 11:00 a.m.** so
2 that Mr. Schriever can personally attend the hearing, as ordered by the Court.

3
4 Respectfully submitted this 7th day of January 2020.

5 HUTCHISON & STEFFEN, PLLC

RICHARD E. ZUCKERMAN

Principal Acting Assistant Attorney General

6 /s/ Matthew K. Schriever

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Attorney for Wells Fargo Bank

25 IT IS SO ORDERED:

ORDER



UNITED STATES MAGISTRATE JUDGE

DATED: 1/7/2020